## RHYTHMS' COMMENTS ON THE
## AMERITECH ILLINOIS OSS PLAN OF RECORD

Rhythms Links, Inc. ("Rhythms") has reviewed SBC/Ameritech's Plan of Record for Illinois ("Illinois POR"), submitted pursuant to the conditions to the Illinois Commerce Commission's approval of the SBC/Ameritech merger. In the Illinois POR, SBC/Ameritech identifies OSS process and interface modifications planned for Illinois. The following comments address Rhythms' concerns with the Illinois POR and suggest improvements to the OSS modifications planned by SBC/Ameritech in Illinois.

The Illinois POR incorporates by reference portions of the SBC/Ameritech OSS Plan of Record for Pre-Ordering and Ordering of xDSL and other Advanced Services (xDSL POR). The xDSL POR was submitted to the Federal Communications Commission ("FCC") pursuant to the FCC Conditions of the SBC/Ameritech Merger. In its comments on the xDSL POR, Rhythms identified a number of serious deficiencies in the descriptions of OSS changes sketched out in the xDSL POR. In addition, Rhythms identified areas in which, given the insufficient level of detail, it was not possible to respond concerning the adequacy of the OSS changes proposed. Finally, Rhythms addressed issues which should have been included in the POR, but on which the POR is entirely silent. To ensure a comprehensive record, Rhythms has attached a copy of its comments to the FCC as Attachment A.

As noted in the comments on the xDSL POR, Rhythms believes SBC should unify its existing disparate legacy OSS into a region-wide set of systems which will support the same capabilities and features in all thirteen SBC states. Additionally, this must be done in parity with SBC's retail xDSL operations and/or the operations of its advanced services affiliate. In upgrading and unifying its existing systems to accomplish this goal, SBC should employ a "best of breed" approach. In other words, if SBC has the capability to offer a feature or functionality in any one state, it should commit to offer that capability throughout its 13-state region as quickly as possible. Thus, SBC should not employ a "least common denominator" approach, nor should it offer features or functionalities on a "where available" basis.

A primary example of the application of these principles is presented by the results of the Rhythms/SWBT arbitration before the Texas Public Utilities Commission. As SBC is aware, the Arbitrators in that proceeding had the benefit of an extremely extensive evidentiary record that they relied upon to reach a detailed decision on OSS requirements consistent with the requirements of the Telecommunications Act of 1996. SBC will be required to comply with this arbitration award in Texas. Because SBC intends to deploy a 13-state-wide strategy for its OSS, it should provide, at a minimum, the same OSS capabilities throughout the entire territory (including Illinois) that it is required to provide in Texas.

## POR Future Method of Operation Section A (Pre-Ordering)

SBC/Ameritech proposes to add new functions to the current EDI interface that were previously provided by Ameritech Illinois only through Data Validation. According to the Illinois POR, those functions will be available in Illinois in April 2000. However, the Illinois POR does not identify the functions that it proposes to make available. Therefore, it is impossible for Rhythms to provide meaningful comment on this issue.

SBC/Ameritech also proposes to introduce a new version of the current EDI application-to-application interface, as well as a pre-ordering Graphical User Interface ("GUI"), both of which would include Digital Subscriber Loop Qualification Inquiry functionality. In describing that functionality, the Illinois POR suggests that it is described more completely in the xDSL POR. However, as Rhythms noted in its comments to the FCC, the xDSL POR provides so little detail concerning the actual operational and technical details that it is impossible to determine precisely how such functionality will be offered. For example, Rhythms requested, and the Texas PUC and the FCC ordered, that SBC provide CLECs with access to all OSS, including those available to internal SBC personnel. Rhythms' Comments to SBC/Ameritech Merger Conditions, OSS Plan of Record for Pre-ordering and Ordering of xDSL and Other Advanced Services at 2. Such systems include SBC's primary loop assignment and tracking tool, LFACS.

In a decision released just last week, the Wisconsin Public Service Commission specifically addressed the inadequacies of Ameritech's loop ordering systems in that state.[1] The PSC stated, "[c]onfidential information cited in the briefs of the intervenors and the staff further support the Commission's finding here that the operational support systems, both pre-ordering and ordering, for handling requests for unbundled loops, including xDSL compatible loops, are inadequate as a matter of law as well as fact." AADS Wisconsin Final Decision and Certificate at 22. To insure non-discriminatory treatment of CLECs, it is essential that SBC/Ameritech's loop ordering and pre-ordering procedures be immediately corrected. In the AADS Wisconsin Final Decision and Certificate the Commission stated: "Given AW's current system for satisfying xDSL loop orders and the extensive need for manual intervention to provision xDSL loops, the Commission has serious concerns as to whether AW will provide xDSL loops on a nondiscriminatory basis. AW's lack of an effective loop prequalification operational support system or preorder process for xDSL loops, directly and negatively impacts on competitor's ability to fulfill customer orders." Id at 9-10.

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[1] Petition of Ameritech Advanced Data Services of Wisconsin, Inc. for Authorization to Resell Frame Delay Switched Multimegabit Data, and Asynchronous Transfer Mode Services on an Intrastate Basis and to Operate as an Alternative Telecommunications Utility in Wisconsin. 7825-TI-100; Investigation into the Digital Services and Facilities of Wisconsin Bell, Inc. (d/b/a Ameritech Wisconsin) 6720-TI-154, January 13, 2000.

The Wisconsin Commission rightly noted that Ameritech Wisconsin's ordering and pre-ordering procedures could easily lead to discriminatory treatment of CLECs.[2] It is for this reason that Rhythms is concerned regarding access to SBC/Ameritech information. In fact, the xDSL POR never mentions LFACS "by name," or provides a sufficient description to determine whether CLECs will be given access to LFACS, or instead to an alternate database containing some or all of the information contained in LFACS.  As a result, Rhythms cannot determine whether the functionalities pointed to in the xDSL POR and Illinois POR will meet Rhythms' needs or the requirements of parity. Therefore, Rhythms requests that SBC/Ameritech provide detailed information regarding the proposed Digital Subscriber Loop Qualification Inquiry functionality, including the exact databases or other sources of loop makeup information that will be made available to CLECs.

Finally, in Attachment A, Rhythms provides further detailed responses regarding the information that will be provided in the Digital Subscriber Loop Qualification Inquiry functionality, as described in the xDSL POR.

**POR Future Method of Operation Section C (Ordering)**

The Illinois POR states that SBC/Ameritech plans some modification of data field usage for ordering of xDSL-capable unbundled loops.  However, the Illinois POR is devoid of any detail concerning exact changes SBC/Ameritech proposes for standardizing these fields.  SBC/Ameritech should immediately inform the Commission and all CLECs what information is to be made available and how such changes will alter SBC/Ameritech's processes and procedures.

The Illinois POR notes SBC/Ameritech's proposal to use the Service or Product Enhancement Code ("SPEC") field on the LSR to request conditioning.  However, the Illinois POR (as well as the xDSL POR) provides insufficient detail to judge whether the proposal has any merit.  The Illinois POR also states that SBC/Ameritech will require the LSR Type of Service (TOS) field to indicate whether a loop is for residence or business service. Absent any explanation and justification, Rhythms opposes this needless disclosure of sensitive business information to SBC as part of the ordering process. Such disclosure of information, given the current potential for discrimination, hinders CLEC chances to receive reliable incumbent service inputs.  Again, the Wisconsin PSC decision in the AADS case is on point.  The PSC noted: "This record supports the conclusion that tariff pricing [*for xDSL and other services*] is reasonable and necessary to prevent injury to competition by the potential discrimination inherent in pre-ordering and ordering OSS that are excessively reliant upon subjective, human intervention and that lack strong controls." Id. at 25 (italicized language added).

The Illinois POR states that SBC/Ameritech's OSS will validate "that an available loop can support the requested Power-Spectrum Density (PSD) class before confirming a

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[2] This PSC decision addresses the record evidence in the Wisconsin case. However, because SBC/ Ameritech proposes to roll out a unified 13 state OSS process, the AADS record is extremely important as a current assessment of the inadequacies of the utility's system operations.

received order." Illinois POR at 29.  Rhythms and other CLECs do not want or need SBC/Ameritech to attempt to perform this task.  Moreover, this proposal appears to indicate that SBC still intends to maintain and/or extend some version of its selective feeder separation/binder group management program currently deployed in several states.  Both the Texas PUC and the FCC found the program to be illegal, and required that the program be dismantled immediately.  Therefore, the Illinois POR should verify that, with the exception of AMI T1s, SBC/Ameritech has dismantled all binder group management or spectrum management programs.

## Line Sharing

The Illinois POR is completely silent with respect to SBC/Ameitech's plans to modify its OSS to comply with the FCC's line sharing order.  Rhythms, as well as other CLECs, are eager to have SBC/Ameritech provide an efficient, mechanized OSS capability to support line sharing.  Therefore, SBC/Ameritech should amend its POR immediately to incorporate OSS changes required to support line sharing.